

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

In re: ) Chapter 11  
)  
W. R. GRACE & CO., et al.,<sup>1</sup> ) Case No. 01-01139 (JKF)  
)  
Debtors. ) (Jointly Administered)

**AFFIDAVIT OF MICHAEL N. PIERGROSSI IN SUPPORT OF DEBTORS' REPLY TO  
RESPONSE FILED BY MARK C. BARNETT TO THE ELEVENTH OMNIBUS  
OBJECTION TO CLAIMS (NON-ASBESTOS GATEWAY)**

State of Maryland )  
) ss  
County of Howard )

Michael N. Piergrossi, being first duly sworn, on oath states as follows:

1. I am an adult and competent to make this affidavit. I have been employed by Debtor W. R. Grace & Co.-Conn. from June 1, 1979 through the present date, most recently as Vice President Human Resources. I make this affidavit based on my own personal knowledge, information and belief.

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<sup>1</sup> The Debtors consist of the following 62 entities: W. R. Grace & Co. (f/k/a Grace Specialty Chemicals, Inc.), W. R. Grace & Co. Conn., A-1 Bit & Tool Co., Inc., Alewife Boston Ltd., Alewife Land Corporation, Amicon, Inc., CB Biomedical, Inc. (f/k/a Circe Biomedical, Inc.), CCHP, Inc., Coalgrace, Inc., Coalgrace II, Inc., Creative Food 'N Fun Company, Darex Puerto Rico, Inc., Del Taco Restaurants, Inc., Dewey and Almy, LLC (f/k/a Dewey and Almy Company), Ecarg, Inc., Five Alewife Boston Ltd., GC Limited Partners I, Inc., (f/k/a Grace Cocoa Limited Partners I, Inc.), GC Management, Inc. (f/k/a Grace Cocoa Management, Inc.), GEC Management Corporation, GN Holdings, Inc. GPC Thomasville Corp., Gloucester New Communities Company, Inc., Grace A-B Inc., Grace A-B II Inc., Grace Chemical Company of Cuba, Grace Culinary Systems, Inc., Grace Drilling Company, Grace Energy Corporation, Grace Environmental, Inc., Grace Europe, Inc., Grace H-G Inc., Grace H-G II Inc., Grace Hotel Services Corporation, Grace International Holdings, Inc. (f/k/a Dearborn International Holdings, Inc.), Grace Offshore Company, Grace PAR Corporation, Grace Petroleum Libya Incorporated, Grace Tarpon Investors, Inc., Grace Ventures Corp., Grace Washington, Inc., W. R. Grace Capital Corporation., W. R. Grace Land Corporation, Gracoal, Inc., Gracoal II, Inc., Guanica-Caribe Land Development Corporation, Hanover Square Corporation, Homco International, Inc., Kootenai Development Company, L B Realty, Inc., Litigation Management, Inc. (f/k/a GHSC Holding, Inc., Grace JVH, Inc., Asbestos Management, Inc.), Monolith Enterprises, Incorporated, Monroe Street, Inc., MRA Holdings Corp. (f/k/a Nestor-BNA Holdings Corporation), MRA Intermedco, Inc. (F/k/a Nestor-BNA, Inc.), MRA Staffing Systems, Inc. (f/k/a British Nursing Association, Inc.), Remedium Group, Inc. (f/k/a Environmental Liability Management, Inc., E&C Liquidating Corp., Emerson & Cuming, Inc.), Southern Oil, Resin & Fiberglass, Inc., Water Street Corporation, Axial Basin Ranch Company, CC Partners (f/k/a Cross Country Staffing), Hayden-Gulch West Coal Company, H-G Coal Company.

2. The Debtors' human resources records database includes a Mark Barnett of 116 Druid Street, Greenville, South Carolina, and indicates that he worked for the Debtors' former Cryovac business in Simpsonville, South Carolina for less than one month (from July 10, 1995 to August 1, 1995).

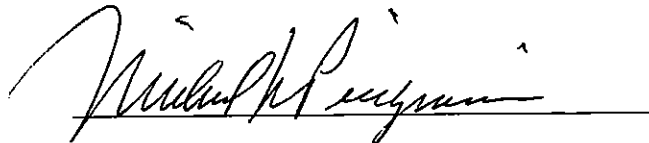
3. The Debtors' human resources records database does not indicate whether Mr. Barnett quit or was fired.

4. The Debtors' human resources records database discloses that Mr. Barnett earned a total of \$1,865.70 during his time of employment.

5. In March of 1998, Cryovac, Inc., a wholly owned subsidiary of debtor W. R. Grace & Co.-Conn. into which assets and liabilities of the Cryovac business had been transferred, was divested to Sealed Air Corporation, and the divested subsidiary kept the relevant business records. Thus, the Debtors do not have possession of any further books or records relating to Mr. Barnett or any basis for a claim.

If called upon to testify in this case, I would testify as outlined herein.

FURTHER AFFIANT SAYETH NOT



Subscribed to and sworn before  
me this 6<sup>th</sup> day of September, 2005

  
Notary Public

MOLLIE K. SPRINKLE  
NOTARY PUBLIC STATE OF MARYLAND  
My Commission Expires December 1, 2006